

REMARKS

CLAIM REJECTIONS - 35 U.S.C. § 102

Claims 1-7, 9, 16, 17, 19, 25-27, 29, 30, 32, 33, and 35 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,253,243 B1 issued to Spencer (*Spencer*). Applicant respectfully submits that claims 1-7, 9, 16, 17, 19, 25-27, 29, 30, 32, 33, and 35 are not anticipated by *Spencer* for at least the reasons described below.

Independent Claims 1, 16, and 25

Claim 1 recites, in part, the following:

obtaining an identifier to identify a class of platforms from the reported detected alert events;
mapping the identifier to a representation of a specific platform type from the class of identified platforms; and
translating said reported alert events to client specific hardware control data via said alert proxy by referring to a platform specific section of an event description file using the mapped representation.

Claims 16 and 25 similarly recite **translating said reported alert events to client specific hardware control data**.

Spencer discloses a system for an automated trap control for a distributed network management system. The Office Action cites *Spencer* as disclosing the limitations of claim 1. *Spencer* discusses that a management protocol adapter (MPA) translates management information server (MIS) requests to protocol specific primitives. See column 2, lines 13-17. The primitives discussed in *Spencer* are **software based** network management protocols and have no interaction with hardware. In contrast, claim 1 recites translating reported alert events to **client specific hardware control data**.

Spencer does not teach or disclose translating reported alert events to client specific hardware control data. Therefore, Applicant submits that claims 1, 16, and 25 are not anticipated by *Spencer*.

Claims 2-7, and 9 depend from claim 1. Claims 17 and 19 depend from claim 16. Claim 26 depends from claim 25. Given that dependent claims necessarily include the limitations of the claims from which they depend, Applicant respectfully submits that claims 2-7, 9, 17, 19, and 25 are not anticipated by *Spencer*.

Independent Claims 27, 29, and 32

Claim 27 recites, in part, the following:

translate said received alert events to platform specific alert events, wherein translating includes comparing the assigned values to an event description file to determine platform specific alert information; and
report the platform specific alert information in a natural language.

Claims 29 and 32 similarly recite **reporting platform specific alert information in a natural language.**

Spencer is cited as teaching the limitations of claim 27. However, *Spencer* does not teach or disclose to report platform specific alert information in a natural language as claimed by Applicant. Therefore, claims 27, 29, and 32 are not anticipated by *Spencer*.

Claim 30 depends from claim 29. Claims 33 and 35 depend from claim 32. Given that dependent claims necessarily include the limitations of the claims from which they depend, Applicant respectfully submits that claims 30, 33, and 35 are not anticipated by *Spencer*.

CLAIM REJECTIONS - 35 U.S.C. § 103

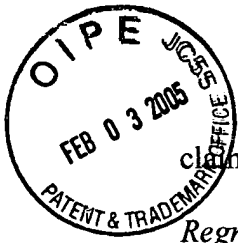
Claims 8, 18, 28, 31, and 34 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,253,243 B1 issued to Spencer (*Spencer*) in view of U.S. Patent No. 5,689,708 A issued to Regnier et al. (*Regnier*). Claims 31 and 34 have been canceled. Therefore, the rejection of these claims is moot. Applicant respectfully submits that claims 8, 18, and 28 are not obvious in view of *Spencer* and *Regnier* for at least the reasons set forth below.

Dependent Claims 8 and 18

As discussed above, *Spencer* fails to teach or disclose at least one limitation from each of the independent claims. *Regnier* was cited as teaching additional limitations from dependent claims 8 and 18, including referencing a plain text “ini” file. Whether or not *Regnier* actually teaches this limitation, *Regnier* does not teach or disclose translating reported alert events to client specific hardware control data as claimed by Applicant in claims 1 and 16. Therefore, *Regnier* fails to cure the deficiencies of *Spencer*. Claim 8 depends from claim 1. Claim 18 depends from claim 16. Thus, Applicant submits that claims 8 and 18 are not obvious in view of *Spencer* and *Regnier*.

Dependent Claim 28

As discussed above, *Spencer* fails to teach or disclose at least one limitation from each of the independent claims. *Regnier* was cited as teaching additional limitations from dependent claim 28, including referencing a plain text “ini” file. Whether or not *Regnier* actually teaches this limitation, *Regnier* does not teach or disclose to report platform specific alert information in a natural language as recited in independent claim 27. Therefore, *Regnier* fails to cure the deficiencies of *Spencer*. Claim 28 depends from



claim 27. Thus, Applicant submits that claim 28 is not obvious in view of *Spencer* and *Regnier*.

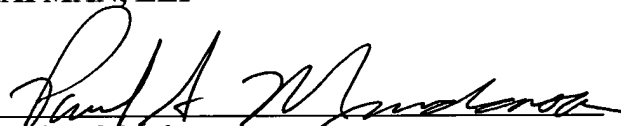
CONCLUSION

In view of the remarks set forth above, Applicants submit that claims 1-9, 16-19, 25-30, 32, 33, and 35 are in condition for allowance and such action is respectfully solicited. The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted,
**BLAKELY, SOKOLOFF, TAYLOR &
ZAFMAN, LLP**

Date: JAN 28, 2005


Paul A. Mendonsa
Reg. No. 42,879

12400 Wilshire Boulevard, Seventh Floor
Los Angeles, CA 90025-1026
(503) 439-8778

PAM/jse